

EXHIBIT 172

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,)
)
Plaintiffs,) Case No.
) 4:20-cv-00957-SDJ
vs.)
)
GOOGLE LLC,)
)
Defendant.)
_____)

DEPOSITION OF JOHN OLSON,
30(b)(6) DESIGNEE FOR THE STATE OF IDAHO
May 3, 2024

Reported by:
Rebecca Martin, CSR #1108, RPR, CRR
Job No. CS6657429

1 and economy of the state. There may be particular
2 groups or individuals who have suffered that harm
3 that may benefit from the redress, for instance,
4 through the injunctive relief that is obtained.

5 Q. Okay. Is Idaho alleging that there has
6 been harm to advertisers in the state of Idaho?

7 A. Yes.

8 Q. And what is the factual basis for the
9 allegations that Google's conduct harmed
10 advertisers in the state of Idaho?

11 A. Similar to what I've answered before,
12 that the Texas witnesses -- the witness as to the
13 common facts, and the common facts here would show
14 nationwide harm to -- apologies, was your question
15 about advertisers?

16 Q. Advertisers, correct.

17 A. Nationwide harm to advertisers, and it
18 appears that the harm to advertisers is not
19 dependent upon the geographic location of those
20 advertisers such that advertisers in Idaho would
21 also be subject to the same nationwide harm that
22 has been alleged and for which Texas is the
23 designated witness as to those common claims.

24 Q. Sitting here today, are you aware of
25 anything Idaho-specific or any Idaho-specific harm

1 or are you only relying on the factual basis
2 alleged by Texas?

3 A. Sitting here today, with the caveats
4 that there's still some discovery ongoing,
5 discovery to be reviewed and digested, as well as
6 what will be shown through the expert reports,
7 sitting here today, I do not have independent
8 Idaho-specific facts.

9 Q. Are you aware of whether any advertisers
10 in Idaho used Google Ad Tech products to sell
11 Display advertising?

12 A. I am not aware of a specific advertiser
13 that does use Google Ad Tech products -- I mean, a
14 specific advertiser in the state of Idaho that uses
15 Google Ad Tech products.

16 Q. Are you aware if there are any
17 advertisers that use Google Ad Tech products?

18 A. I'm not aware of a specific one or any
19 specific one. I would assume, again, based on the
20 nationwide harm, Google's sizable market share in
21 the market, that there are advertisers here in
22 Idaho that use Google Ad Tech products.

23 Q. Is Idaho alleging that Google's alleged
24 conduct harmed publishers in Idaho?

25 A. Yes.

1 factual basis alleged in the Fourth Amended
2 Complaint, described in our interrogatory
3 responses, and to which the Texas designated
4 witness testified.

5 And then as to Idaho, being that it's
6 nationwide harm and nothing indicating that the
7 location of the individual, that the harm is
8 related to that, that Idaho individuals are -- I
9 believe, as you said, citizens would likewise be
10 harmed to the same extent as identified in the
11 Fourth Amended Complaint and our discovery
12 responses.

13 Q. Can you identify anything separate and
14 apart from what Texas alleged and testified to as
15 the factual basis for the allegation that Google's
16 conduct harmed consumer -- individuals in the state
17 of Idaho?

18 A. I'll have to, again, reiterate that it
19 would not necessarily be limited to what the Texas
20 witness said, but also as described in our
21 interrogatory responses and in the Fourth Amended
22 Complaint.

23 But there -- yeah, I'm not aware
24 currently of any independent Idaho facts regarding
25 the harm to Idaho individuals or citizens.

REPORTER'S CERTIFICATE

STATE OF IDAHO)
) ss.
COUNTY OF ADA)

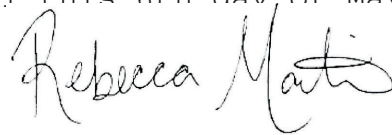
I, REBECCA MARTIN, Certified Shorthand Reporter and Notary Public in and for the State of Idaho, do hereby certify:

That prior to being examined, the witness named in the foregoing deposition was duly sworn remotely by me to testify to the truth, the whole truth and nothing but the truth;

That said deposition was taken down by me in shorthand at the time and place therein named and thereafter reduced to typewriting under my direction, and that the foregoing transcript contains a full, true and verbatim record of said deposition.

I further certify that I have no interest in the event of the action.

WITNESS my hand and seal this 6th day of May 2024



REBECCA MARTIN
RPR and Notary
Public in and for the
State of Idaho

My Commission Expires: 08-27-2024